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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

: CONSENT PRELIMINARY ORDER OF
FORFEITURE AS TO SPECIFIC
PROPERTY/MONEY JUDGMENT

-v.-

KAREN ALAMEDDINE,
a/k/a "Karen Dean,"

: 14 Cr. 808 (GHW)

:

Defendant. :

:

WHEREAS, on or about December 8, 2014, KAREN ALAMEDDINE, a/k/a "Karen Dean," (the "defendant"), was charged in a seven-count Indictment, 14 Cr. 808 (GHW) (the "Indictment"), with wire fraud in violation of Title 18, United States Code, Section 1343 (Count One); money laundering in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(ii), 1956(a)(1)(B)(i), and 2 (Count Two); and tax evasion in violation of Title 26, United States Code, Section 7201 (Counts Three through Seven);

WHEREAS, the Indictment included a forfeiture allegation as to Count One, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, Section 2461, any property, real or personal, which constitutes, or is derived from, proceeds traceable to the offense charged in Count One of the Indictment;

WHEREAS, the Indictment included a second forfeiture allegation as to Count Two, seeking forfeiture to the United States, pursuant to title 18, United States Code, Section 982(a)(1), any and

all property, real and personal, involved in the money laundering offense charged in Count Two of the Indictment;

WHEREAS, on or about April 30, 2015, the defendant pled guilty to Counts One and Seven of the Indictment and admitted the forfeiture allegation with respect to Count One of the Indictment, pursuant to a plea agreement with the Government, wherein the defendant agreed to forfeit to the United States, pursuant to Title 18, United States Code, 981(a)(1)(C) and Title 28, United States Code, Section 2461, (i) a sum of money equal to at least \$1,828,000.00 in United States currency, representing some or all of the property, real or personal, which constitutes or is derived from proceeds traceable to the offense alleged in Count One of the Indictment; and (ii) all right, title and interest of the defendant in the following specific property:

- a. Any and all U.S. currency on deposit in Account Number 9803612739, in the name of Dean and Company LL;
- b. Any and all U.S. currency on deposit in Account Number 9804698331, in the name of Karen J. Alameddine;
- c. Any and all U.S. currency on deposit in Account Number 9804427145, in the name of Karen J. Alameddine;
- d. Various items of jewelry seized from KAREN ALAMEDDINE, a/k/a "Karen Dean," the defendant on or about November 17, 2014, and currently in the custody of the IRS, including but not limited to:
 - i. eight gold bracelets;

- ii. two watches;
- iii. four pairs gold earrings;
- iv. a pearl necklace and bracelet;
- v. a silver necklace with blue and pearl beads;
- vi. one pair gold and white earrings;
- vii. a gold necklace;
- viii. two clear stone bracelets;
- ix. one pair clear stone earrings;
- x. one pair blue beads;
- xi. a pearl necklace with a clear stone pendant;
- xii. 12 rings bearing stones of various colors and makes
(and specifically not including two 21-karat wedding
yellow and gold wedding bands);
- xiii. three pairs of pearl earrings; and
- xiv. five pairs of earrings bearing stones of various colors
and makes.

(a. through d. collectively, the "Specific Property");

WHEREAS, the defendant consents to the entry of a money judgment in the amount of \$1,828,000.00 in United States currency representing the amount of proceeds obtained as a result of the offenses charged in Counts One and Seven of the Indictment and consents to the forfeiture of the all of her right, title and interest in the Specific Property;

IT IS HEREBY STIPULATED AND AGREED, by and between the plaintiff, United States of America, by its attorney Preet Bharara, United States Attorney, Assistant United States Attorney Stanley J. Okula, of counsel, and the defendant, and his counsel, Joshua L. Dratel, Esq., that:

1. As a result of the offenses charged in Counts One and Seven of the Indictment, to which the defendant pled guilty, a money judgment in the amount of \$1,828,000.00 in United States currency (the "Money judgment") shall be entered against the defendant. Upon the entry of a Final Order of Forfeiture as to the Specific Property, the Specific Property shall be applied towards the partial satisfaction of the Money Judgment.

2. As a result of the offenses charged in Counts One and Seven of the Indictment, all of the defendant's right, title and interest in the Specific Property is hereby forfeited to the United States for disposition in accordance with the law, subject to the provisions of Title 21, United States Code, Section 853.

3. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, upon entry of this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment, this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment is final as to the defendant, KAREN ALAMEDDINE, and shall be deemed part of the sentence of the defendant, and shall be included in the judgment of conviction therewith.

4. All payments on the outstanding Money Judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to the United States Treasury Department (or its designee), and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Asset Forfeiture Unit, One Saint Andrew's Plaza, New York, New York 10007 and shall indicate the defendant's name and case number.

5. Upon entry of this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment, and pursuant to Title 21, United States Code, Section 853, the United States Treasury Department (or its designee) shall be authorized to deposit the payments on the Money Judgment in the Treasury Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

6. Pursuant to Title 21, United States Code, Section 853(n)(1), Rule 32.2(b)(6) of the Federal Rules of Criminal Procedure, and Rules G(4)(a)(iv)(C) and G(5)(a)(ii) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, the United States shall publish for at least thirty (30) consecutive days on the official government internet forfeiture site, www.forfeiture.gov, notice of this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment. Any person, other than the defendant in this case, claiming an interest in the Specific Property must file a

petition within sixty (60) days from the first day of publication of the notice on this official government internet site, or no later than thirty-five (35) days from the mailing of actual notice, whichever is earlier.

7. This notice shall state that the petition shall be for a hearing to adjudicate the validity of the petitioner's alleged interest in the Specific Property, shall be signed by the petitioner under penalty of perjury, and shall set forth the nature and extent of the petitioner's right, title and interest in the Specific Property and any additional facts supporting the petitioner's claim and the relief sought, pursuant to Title 21, United States Code, Section 853(n).

8. Pursuant to Rule 32.2(b)(6)(A) of the Federal Rules of Criminal Procedure, the Government shall send notice to any person who reasonably appears to be a potential claimant with standing to contest the forfeiture in the ancillary proceeding.

9. Upon adjudication of all third-party interests, this Court will enter a Final Order of Forfeiture with respect to the Specific Property pursuant to Title 21, United States Code, Section 853(n) and Rule 32.2(c)(2) of the Federal Rules of Criminal Procedure, in which all third-party interests will be addressed.

10. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture as to Specific Property/Money

Judgment, and to amend it as necessary, pursuant to Rule 32.2(e) of the Federal Rules of Criminal Procedure.

11. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, upon entry of this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas, pursuant to Rule 45 of the Federal Rules of Civil Procedure.

12. The Clerk of the Court shall forward three certified copies of this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment to Assistant United States Attorney Edward B. Diskant, Money Laundering and Asset Forfeiture Unit, One Saint Andrew's Plaza, New York, New York, 10007.

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13. The signature pages of this Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

PREET BHARARA
United States Attorney for the
Southern District of New York

By: Stanley J. Okula, Jr.
STANLEY J. OKULA
Assistant United States Attorney
One Saint Andrew's Plaza
New York, NY 10007
(212) 637-1585

01/06/16
DATE

KAREN ALAMEDDINE
DEFENDANT

By: Karen Alameddine
KAREN ALAMEDDINE

12-3-15
DATE

By: Joshua L. Dratel
JOSHUA L. DRATEL, Esq.
Attorney for Defendant
The Law Offices of Joshua Dratel, P.C.
29 Broadway, Suite 1412
New York, NY 10006
(212) 732-0707

12/3/15
DATE

SO ORDERED:

G. Woods
HONORABLE GREGORY H. WOODS
UNITED STATES DISTRICT JUDGE

1/25/16
DATE